

Objectives and Guidelines
for
Unannounced Drills
with
California Oil Spill
Contingency Plan Holders



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California Department of Fish and Game
Office of Spill Prevention and Response (OSPR)

INTRODUCTION

The purpose of this document is to outline the scope and nature of the Office of Spill Prevention and Response's (OSPR) unannounced drill program. It also provides an overview of drill processes and the criteria used to evaluate marine oil pollution response procedures contained in approved oil spill contingency plans.

Title 14, California Code of Regulations, Section 820.02(g), states in part, "The Administrator may call a drill or exercise, or conduct an inspection, to validate all or part of a contingency plan. This drill, exercise, or inspection may be announced or unannounced."

Unannounced drills will be coordinated and conducted by OSPR with the support of other federal, state, and local government entities as necessary.

UNANNOUNCED DRILL OBJECTIVES

The objectives of unannounced drills held under these guidelines are to demonstrate the ability of plan holders to make timely notifications to all appropriate parties, ensure the deployment of resources in accordance with their response planning volume listed in their approved plans and insure proper advance notice has been given to OSRO's for shoreline protection requirements.

UNANNOUNCED DRILL GUIDELINES

Control of the drill will be the responsibility of the designated OSPR Drill Coordinator. The scenarios will be designed by OSPR.

Anyone may stop the drill for safety reasons. Once stopped, only the Drill Coordinator may restart the drill.

Drill activities may occur during oil, cargo and personnel transfers but will be planned to minimize interruptions during these transfer operations.

All State, Federal, and local costs incurred in conjunction with participation in the exercise will be borne by each respective agency. All other costs will be the responsibility of the plan holder.

Sequence of Events

Notification and Equipment Deployment requirements.

Immediate

Boom deployment – In order to minimize interruption of cargo and bunker transfers, marine facilities and bunker providers will be given the opportunity to deploy their containment boom prior to commencement of the simulated spill during the unannounced drill. The boom provided by the marine facility or bunker provider to meet the immediate booming requirement need not be deployed during the unannounced drill. Facilities and vessels that comply with Title 2, Article 5, Section 2395(c)(1)(2)(3) (California State Lands pre-booming requirement), will satisfy this objective. Timing of drill events starts with the notification process. Pre-deployed boom totals count towards the two-three hour boom requirement.

Zero to Thirty minutes

Notify Oil Spill Response Organization (OSRO) by phone.

Notify Qualified Individual (QI) by phone.

Notify California Governor's Office of Emergency Services (OES) by phone.

Notify (simulate) National Response Center (NRC) by phone.

Two and Three hour

Boom deployment – Recommend 2,000' boom (600' immediate, 600' within the next hour and 800' additional) for a 3,125 barrel spill.

Skimming capacity – 3,125 bbls/day or 10 percent of the Reasonable Worst Case Spill (RWCS)(Facilities) or total cargo capacity (Tank vessels) and 2,500 bbls/day or 10 percent of the total fuel capacity (Non tank vessels), whichever is less, must be mobilized, on-scene and deployed within two hours from the start of the drill. Plan holders will have three hours to deploy and operate skimming equipment if sufficient boom for a 3,125/2500 barrel spill can be immediately deployed (Recommend 2000 feet). (See matrixes on following page)

Sufficiently trained personnel should be on the scene and prepared to deploy and operate all equipment within one hour of arrival and no later than the designated timeframes. Similarly, all equipment shall be in such condition that it will be deployed and operated within one hour of arrival.

Storage capacity - Plan holders must demonstrate the operational capability to transfer recovered oil to adequate storage. This may consist of the storage associated with the skimming system.

Boats and personnel - Adequate amounts of personnel and boats must be employed for on-water activities.

Shoreline Protection – Plan Holders shall demonstrate that sufficient response resources are available to meet shoreline protection tables in ports other than high volume. These resources will be called out to ensure that the OSRO has pre-staged presence and capabilities where applicable.

Marine Facility

Time	Notification	Containment Boom	On-water Recovery
1/2 hour	QI, OES, OSRO, NRC	* 600 feet ** 2000 feet (total) (recommended)	
1 hour			
1 ½ hours		* 600 feet	
2 hours		2000 feet (total) (recommended)	3125 bbl/day <u>or</u> 10% of the RWCS which ever is less
3 hours			** 3125 bbl/day <u>or</u> 10% of the RWCS which ever is less

* During oil transfer only

** If containment boom can be immediately deployed

Tank Vessel

Time	Notification	Containment Boom	On-water Recovery
1/2 hour	QI, OES, OSRO, NRC	*600 feet ** 2000 feet (total) (recommended)	
1 hour			
1 ½ hours		*600 feet	
2 hours		2000 feet (total) (recommended)	3125 bbl/day <u>or</u> 10% of the total cargo capacity which ever is less
3 hours			** 3125 bbl/day <u>or</u> 10% of the total cargo capacity which ever is less

* During oil transfer only

** If containment boom can be immediately deployed

Non-Tank Vessel
(Conducting oil transfers)

Time	Notification	Containment Boom	On-water Recovery
1/2 hour	QI, OES, OSRO, NRC	600 feet * 2000 feet (total) (recommended)	
1 hour			
1 ½ hours		600 feet	
2 hours		2000 feet (total) (recommended)	3125 bbl/day <u>or</u> 10% of the total fuel capacity which ever is less
3 hours			* 3125 bbl/day <u>or</u> 10% of the total fuel capacity which ever is less

***If containment boom can be immediately deployed**

Non-Tank Vessel
Stockton and Sacramento,
Humboldt Bay, and Monterey Bay
Operating (underway)

Time	Notification	Containment Boom	On-water Recovery
1/2 hour	QI, OES, OSRO, NRC	* 2000 feet (total) (recommended)	

*** Must have containment boom (recommended 2000 feet of containment boom) and associated deployment equipment for a 2500 barrel spill pre-staged so that it can be immediately deployed.**

Note - Vessels will not be boarded while underway.

Non-Tank Vessel
Not Operating (moored)

Time	Notification	Containment Boom	On-water Recovery
1/2 hour	QI, OES, OSRO, NRC		

EVALUATION

The Administrator will provide the participating plan holder with a drill evaluation report after the drill's conclusion. This report will indicate the credit status of the drill exercise.

If a plan holder refuses to participate, the Administrator shall revoke the appropriate contingency plan. If a plan holder fails to meet the zero to three-hour drill, the Administrator may require an additional unannounced drill or take other appropriate actions, which may include revoking the contingency plan. If deficiencies are noted, the plan holder will have 30 days to correct them to the satisfaction of the Administrator.

If a plan is revoked, due to a plan holder's unannounced drill performance, a plan holder may appeal the decision in accordance with Title 14, California Code of Regulations, Section 816.03 (g) and 826.03 (g).

These exercises may fulfill the semi-annual equipment deployment exercise requirement of facility-owned equipment pursuant to California Code of Regulations, Title 14, Section 817.02 (k)(1)(B). Plan holders may request credit to fulfill the equipment deployment exercise requirements of Section 817.02(k)(3) for marine facilities; Section 818.02 (l)(1) (D) for tank vessels; and, Section 827.02 (m)(1)(B) for non-tank vessels as appropriate.